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From: Melcher, John
Sent: Friday, November 07, 2014 12:14 PM
To: Jane Stahl
Subject: RE:
Attachments: Brockton Final SSO AOC 14-014.pdf; GNHWPCA CMOM 2014-11-06.docx
Categories: Record Saved - Shared

Hi Jane,

As we discussed yesterday morning, I'm attaching two documents.

First, I'm providing an example of Findings that we include in an Order addressing SSOs. See the attached Administrative Order on Consent with Brockton, Massachusetts.

Second, I'm providing a response to your comments on behalf of the Authority a couple of weeks ago on the CMOM "content." I accepted all the changes in the version from Oct. 27 and made some additional tracked changes. I included comments to respond to your comments and to explain my changes.

Like you said in your email, you had a suggestion to change the approach on the CMOM Program Manual. We can talk about this further, but I think that it is appropriate to provide a comprehensive list of topics to be covered in the manual, rather than tie its content directly to the 2011 CMOM Plan and the earlier deliverables from this agreement.

I'll be out of the office Monday and Tuesday, but otherwise am always happy to talk. Thanks for your help on all this, Jack

From: Jane Stahl [mailto:jkstahl@comcast.net]
Sent: Tuesday, October 28, 2014 5:08 PM
To: Melcher, John
Subject: RE:

PS: I think your response re my date adjustments reflects what I meant! So, probably wise to talk through the areas that you're still checking on before we get firm in our respective resolves!
Jane

From: Melcher, John [mailto:Melcher.John@epa.gov]
Sent: Tuesday, October 28, 2014 3:35 PM
To: Jane Stahl
Subject: RE:

Hi Jane,

Thanks for your comments. I agree that this is a useful process for getting on the same page as to what the agreement should entail.

I'm attaching the document with my initial responses to your comments... some of which are, "Let me think about it!" I need to run some of this by senior staff, so it may be a week or two before I'm back to you with a full response.

Michael and I would be happy to discuss the AOC boilerplate with you. Is there a time Thursday morning (Nov 6) that would work for you?

Regards,
Jack

From: Jane Stahl [<mailto:jkstahl@comcast.net>]
Sent: Monday, October 27, 2014 5:36 PM
To: Melcher, John
Subject:

Hi Jack –

Thank you again for meeting with us regarding the potential CMOM content to be addressed by GNHWPCA. The meeting was very useful in assuring that we understand what EPA will be looking for as satisfactorily meeting your expectations. With that enhanced understanding, I met again with the GNH “team” and we took a crack at marking up the revised document you sent us. I hope you’ll agree that our proposed changes continue to clarify what we would expect to provide in order to meet certain items. The most significant changes appear in the reporting section vis a vis the CMOM Program Manual; recognizing that this was a wholesale new section, we again wanted to assure that both EPA and GNH agreed on the expectation of what would be accomplished.

I think my comments and changes show up as purplish while your prior changes show as blue; I hope they’ll be self explanatory. So, take a look and let me know what you think. Hopefully, we’re on the same page substantively and we can move on to the process issues. To that end it would probably make sense for you and Mike and me to talk through some of the questions I have arising from the AOC boilerplate you shared with me. I’m heading out of town from Thursday through next Tuesday (already absentee voted!); if it doesn’t look like we’ll get a chance to speak before I leave, perhaps we can at least share some availabilities for when I get back.

Thanks again Jack. Talk soon.
Jane